

1 JAMES P. KEMP, ESQUIRE
2 Nevada Bar No. 006375
3 KEMP & KEMP, ATTORNEYS AT LAW
4 7435 W. Azure Drive, Suite 110,
5 Las Vegas, NV 89130
(702) 258-1183 tel./(702) 258-6983 fax
jp@kemp-attorneys.com
Attorney for Plaintiff Deborah Carroll

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 DEBORAH CARROLL,) Case No. 2:18-cv-00960-JCM-BNW
9)
10 Plaintiff,) **STIPULATION AND ORDER TO**
11 v.) **EXTEND TIME FOR PLAINTIFF**
12 LADAH LAW FIRM PLLC; and RAMZY) **TO RESPOND TO**
13 LADAH;) **DEFENDANTS' MOTION FOR**
14 Defendants.) **SUMMARY JUDGMENT**
15) **(FIRST REQUEST)**
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion for Summary Judgment (ECF No. 22) from the current due date of Monday, October 7, 2019 through and including Monday, October 28, 2019.

This is the first request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

- 23 1. Plaintiff's counsel was on vacation at the time that the Motion for Summary
24 Judgment was filed on September 16, 2019 and his first day back in the office
25 after vacation was September 26, 2019 and, thus, he has not had the benefit of
26 the full response period to address the Motion for summary judgment;

27
28

- 1 2. Additionally, Plaintiff's counsel is facing a very heavy workload with two
2 other Summary Judgment Oppositions (in addition to the one in this case) due
3 between now and November 1, 2019, an Opening Brief due in Judicial Review
4 of a workers' compensation decision in state district court due on October 26,
5 2019, a Reply Brief due in another Judicial Review case due on October 18,
6 2019, and a Reply Brief due on a Ninth Circuit appeal that has been extended
7 to November 4, 2019. These are all significant matters most of which
8 requiring appellate level briefing;
- 9
10 3. Additionally, Plaintiff's counsel is due to have knee surgery on October 18,
11 2019 and will be unable to work for at least a couple of days post surgery.

12
13 This stipulation to extend the deadline is made in good faith and not for purposes of
14 delay.

15 September 30, 2019.

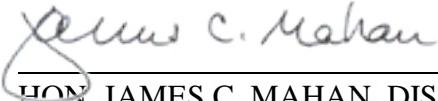
16 KEMP & KEMP

17 FISHER & PHILLIPS LLP

18 By: /s/ James P. Kemp, Esq.
19 7435 W. Azure Dr.
20 Suite 110
21 Las Vegas, Nevada 89130
22 Attorneys for Plaintiff

23 By: /s/ Scott M. Mahoney, Esq.
24 300 South Fourth Street
25 Suite 1500
26 Las Vegas, Nevada 89101
27 Attorneys for Defendants

28 IT IS SO ORDERED:

29
30 
31 HON. JAMES C. MAHAN, DISTRICT JUDGE

32 October 1, 2019
33 Dated: _____

KEMP & KEMP
ATTORNEYS AT LAW
7435 W. Azure Drive, Suite 110
LAS VEGAS, NEVADA 89130
Tel. (702) 258-1183 • Fax (702) 258-6983